

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PHILIP HALPERT, derivatively on behalf of)	
ASIAINFO-LINKAGE, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
STEVE ZHANG, JIAN DING, LIBIN SUN,)	
SEAN SHAO, YUNGANG LU, DAVIN A.)	C.A. No. 12-cv-01339-SLR
MACKENZIE, THOMAS J. MANNING,)	
SUNING TIAN, XIWEI HUANG, and)	
GUOXIANG LIU,)	
)	
Defendants,)	
)	
-and-)	
)	
ASIAINFO-LINKAGE, INC., a Delaware)	
Corporation,)	
)	
Nominal Defendant.)		

**AFFIDAVIT OF SCOTT B. CZERWONKA IN SUPPORT OF
NOMINAL DEFENDANT ASIAINFO-LINKAGE, INC.'S MOTION TO STAY**

STATE OF DELAWARE :

 :

COUNTY OF NEW CASTLE :

I, Scott B. Czerwonka, being duly sworn, hereby state as follows:

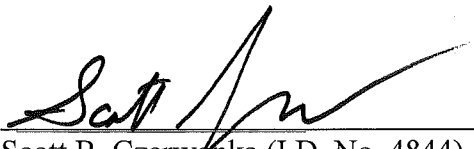
1. I am an associate attorney with the law firm of DLA Piper LLP (US), counsel for Nominal Defendant AsiaInfo-Linkage, Inc. in the above-captioned action. DLA Piper also represents AsiaInfo-Linkage, Inc. and certain individual defendants in the consolidated class action pending in the Court of Chancery, styled *In re AsiaInfo-Linkage, Inc. S'holders Litig.*, Consol. C.A. No. 8583-VCP. I submit this affidavit in support of Nominal Defendant AsiaInfo-Linkage, Inc.'s Motion To Stay, filed contemporaneously herewith.

2. Attached to this affidavit are true and correct copies of the following exhibits:

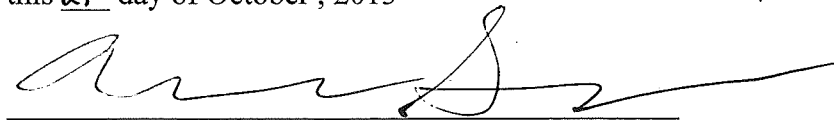
Exhibit	Description
A	Agreement and Plan of Merger Among Skipper Limited, Skipper Acquisition Corporation, and AsiaInfo-Linkage, Inc., dated May 12, 2013
B	Consolidation Order, <i>In re AsiaInfo-Linkage, Inc. S'holders Litig.</i> , Consol. C.A. No. 8583-VCP, Dkt. No. 5 (Del. Ch. Aug. 6, 2013)
C	Verified Consolidated Amended Class Action Complaint, <i>In re AsiaInfo-Linkage, Inc. S'holders Litig.</i> , Consol. C.A. No. 8583-VCP, Dkt. No. 6 (Del. Ch. Aug. 9, 2013)
D	Schedule 14A, Preliminary Proxy Statement Pursuant to Section 14(a) of the Securities Exchange Act of 1934, dated July 23, 2013

3. On August 19, 2013, defendants in the Court of Chancery action received a settlement demand from Levi & Korsinsky LLP, co-lead counsel for the class action plaintiffs. In response to that letter, the parties engaged in settlement negotiations and are on the verge of entering into a memorandum of understanding.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


 Scott B. Czerwonka (I.D. No. 4844)
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 Wilmington, DE 19801
 (302) 468-5700
 scott.czerwonka@dlapiper.com

SWORN TO AND SUBSCRIBED BEFORE ME,
 this 27th day of October, 2013



Andrew H. Sauder, Attorney (I.D. No. 5560)
 Signed Pursuant to 29 Del. C. § 4323